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Attorneys for: TINU KHANNA

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	No. 2:22-CR-00213-KJM
	)	
Plaintiff,	)	STIPULATION AND [PROPOSED]
	)	ORDER TO MODIFY
	)	CONDITIONS OF
	)	PRETRIAL RELEASE
	)	
vs.	)	
	)	
TINU KHANNA (2),	)	
Defendant.	)	

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Defendant, TINU KHANNA, hereby submits a Stipulation and Proposed Order for a one-time modification of his pretrial release conditions.

Stipulation and Grounds for Modification:

Defendant was released on or about December 27, 2023. Special Conditions pertinent to this request and stipulation are as follows:

*5. You must restrict your travel to the District of New Jersey and the Eastern District of California (for Court purposes) unless otherwise approved in advance by the pretrial services officer. And,*

*14. You must adhere to a curfew and remain inside your residence every day from 6:00pm to 6:00am, or as adjusted by the pretrial services officer for medical, religious services, employment or Court-ordered obligations.*

1 To date Defendant has been in compliance with all of his Special Conditions of  
2 Release, which has been verified by the office of his District of New Jersey's Pretrial  
3 Office.

4  
5 In celebration of a religious moonrise celebration on October 20, 2024 Defendant  
6 and his family will be attending a prayer at Sri Guruvaayoorappan Temple in  
7 Morganville, NJ, from 4 PM to 7 PM EST and, thereafter, they will observe the moon  
8 around 8 PM EST. To accommodate this it is agreed that Tinu Khanna's curfew be  
9 extended to midnight on October 20, 2024. Both the prosecutor in this case, AUSA  
10 Veronica Alegria as well as Pretrial Service Officer, Renee Basurto, have verified the  
11 above facts and have no opposition to this one-time modification.  
12

13 IT IS SO STIPULATED.

14 Dated: October 17, 2024

/s/ VERONICA ALEGRIA  
VERONICA ALEGRIA  
Assistant US Attorney  
for the Government

15  
16  
17 Dated: October 17, 2024

/s/ PETER KMETO  
PETER KMETO  
Attorney for Defendant  
TINU KHANNA

ORDER

UPON GOOD CAUSE SHOWN and the stipulation of the two parties IT IS ORDERED that Defendant TINU KHANNA's release conditions shall be modified to extend his curfew on October 20, 2024 to midnight. All other conditions of release shall remain the same.

Dated: October 17, 2024



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The Hon. Sean C. Riordan  
United States Magistrate Judge